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REPLY TO
ATTN OF: EM-453.1 (A. Rampertaap, 3-8191)

SUBJECT: Review Comments for Draft Technical Memorandum Number 5, Operable Unit 2

TO: R. Schassburger, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division (EM-453), has reviewed the "Draft Technical Memorandum Number 5, Human Health Risk Assessment 903 Pad, Mound, and East Trenches Areas, Exposure Scenarios (Operable Unit (OU) 2)" document and has prepared the attached comments for your consideration in preparing the final document. Please address these comments during the document finalization process. These comments were faxed to your earlier in the draft form on | not!
March 3, 1993.

Our first major concern with the document is that the site descriptions in Section 2.1 indicate that all Individual Hazardous Substance Sites (IHSSs) in OU 2 (with the possible exceptions of the Reactive Metal Destruction Site, the Gas Detoxification Site and the East Spray Irrigation Sites) have had the surface soil removed or covered with asphalt or clean soil. If these descriptions are correct, it would appear that there is no major source of contaminants to be released via the postulated surface soil-related release mechanisms. There may be no complete exposure pathways associated with surface soils. Please discuss this issue further.

Our other major concern is that this document assumes the source areas for contaminated surface soil are the IHSSs. The surface soil sampling proposed in Technical Memorandum (TM) Number (No.) 7 (January 1993) for this OU specifies only 6 samples in the IHSSs, 2 in the 903 Pad Area, 2 in the Mound, and 2 in the East Trenches. If surface soil contamination does exist, the analytical results from these 6 samples are unlikely to be adequate for risk assessment or for the contaminant transport modeling proposed, especially given the disparate disposal histories of these IHSSs. TM No. 7 also recommends reconnaissance sampling of an area of about 1 square mile east of the IHSSs.

It is unclear how these samples would be used in this Risk Assessment. Recommend that there be more coordination between actual Risk Assessment needs and proposed sampling.

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Please contact me at (301) 903-8191, if you have any questions regarding these review comments.



Autar Rampertaap
Chief
Rocky Flats Branch
Rocky Flats/Albuquerque Production Division
Office of Southwestern Area Programs

Attachment

cc w/o attachment:
R. Greenberg, EM-453
J. Hartman, RF